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DONOVAN E. WALKER
Lead Counsel
dwalker@idahopower.com

December 19, 2014

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-14-36
Orchard Ranch Solar, LLC – Idaho Power Company's Reply Comments

Dear Ms. Jewell:

Enclosed for filing in the above matter please find an original and seven (7) copies of Idaho Power Company's Reply Comments.

Very truly yours,



Donovan E. Walker

DEW:csb
Enclosures

DONOVAN E. WALKER (ISB No. 5921)
Idaho Power Company
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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF IDAHO POWER COMPANY FOR)	CASE NO. IPC-E-14-36
APPROVAL OR REJECTION OF AN)	
ENERGY SALES AGREEMENT WITH)	IDAHO POWER COMPANY'S
ORCHARD RANCH SOLAR, LLC FOR THE)	REPLY COMMENTS
SALE AND PURCHASE OF ELECTRIC)	
ENERGY.)	
)	

Idaho Power Company ("Idaho Power"), in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 33172 and Order No. 33189 granting the Idaho Public Utilities Commission ("Commission") Staff's ("Staff") request to extend the comment deadlines and in response to the Comments of the Commission Staff filed on December 12, 2014, hereby respectfully submits the following Reply Comments to the Commission. With these Reply Comments, Idaho Power submits, as Attachment 1 hereto, a replacement page 39, to incorporate a change in the project location into Appendix B of the Energy Sales Agreement ("ESA").

1. On November 21, 2014, Idaho Power filed Initial Comments in this matter which submitted a "Replacement Appendix E" reflecting the Commission-approved rate adjustments from the Grand View Solar and Boise City Solar cases. Order No. 33179 (Grand View Solar); Order No. 33180 (Boise City Solar).

2. On December 12, 2014, Staff filed Comments recommending, for Orchard Ranch Solar, that the Commission approve the ESA utilizing the Replacement Appendix E prices filed with Idaho Power's Initial Comments on November 21, 2014.

3. On December 18, 2014, Murphy Flat Power, LLC; Simco Solar, LLC; American Falls Solar, LLC; American Falls Solar II, LLC; and Orchard Ranch Solar, LLC, filed Reply Comments. In those Reply Comments, Murphy Flat Power, Simco Solar, and American Falls Solar, each accepted Staff's recommended additional adjustment from Idaho Power's Response to the Third Production Request of Staff, and consented to Idaho Power preparing and submitting a revised Appendix E for each project's ESA reflecting that recommended adjustment. American Falls Solar II and Orchard Ranch Solar each accepted Staff's recommendation that their ESAs be approved incorporating the rate adjustments reflected in the "Replacement Appendix E" that was submitted with Idaho Power's Initial Comments of November 20, 2014. Additionally, Simco Solar and Orchard Ranch Solar provided information identifying their respective project locations in Appendix B of the ESAs. Submitted herewith as Attachment 1 is a replacement page 39, in both clean and redlined format, to incorporate the change in project location into Appendix B of the ESA for Orchard Ranch Solar.

4. Should the Commission determine to accept Staff's recommendation, Idaho Power recommends incorporation and approval of the replacement page 39, with the approval of the ESA, rather than incorporating the same through a contract amendment.

Respectfully submitted this 19th day of December 2014.



DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of December 2014 I served a true and correct copy of IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Kristine A. Sasser
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington (83702)
P.O. Box 83720
Boise, Idaho 83720-0074

☒ Hand Delivered
☐ U.S. Mail
☐ Overnight Mail
☐ FAX
☒ Email kris.sasser@puc.idaho.gov

Orchard Ranch Solar, LLC

Ron Williams
Williams Bradbury, P.C
1015 West Hays Street
Boise, Idaho 83702

☐ Hand Delivered
☒ U.S. Mail
☐ Overnight Mail
☐ FAX
☒ Email ron@williamsbradbury.com

Ben Fairbanks
Director, Development
First Wind

☐ Hand Delivered
☐ U.S. Mail
☐ Overnight Mail
☐ FAX
☒ Email bfairbanks@firstwind.com


Christa Beary, Legal Assistant

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-14-36

IDAHO POWER COMPANY

ATTACHMENT 1

CLEAN FORMAT

APPENDIX B

FACILITY AND POINT OF DELIVERY

Project Name: Orchard Ranch Solar, LLC

Project Number: 25573998

B-1 DESCRIPTION OF FACILITY

(Must include the Nameplate Capacity rating and VAR capability (both leading and lagging) of all Generation Units to be included in the Facility.)

Orchard Ranch Solar, LLC is a 20 MW AC; 26.19 MW DC single-axis tracking photovoltaic facility to be located on approximately 160 acres near Orchard in Ada County, Idaho. The Project consists of 10 (ten) x 2.0 MWac SMA inverters (or equivalent) and 85,880 x JA 305w dc panels (or equivalent).

Nameplate: 20 MWac

Var Capability (Both leading and lagging) Leading is 0.95 Lagging is 0.95.

B-2 LOCATION OF FACILITY

Near: Pleasant Valley, ID

Actual or nearest physical street address: Pleasant Valley Road Ada County, Idaho 83716

GPS Coordinates: Latitude Decimal Degrees: 43°27'30.15"N

Longitude Decimal Degrees: 116°14'3.32"W

State: Idaho County: Ada

Description of Interconnection Location: 34.5kV line near Pleasant Valley Road

B-3 SCHEDULED FIRST ENERGY AND OPERATION DATE

Seller has selected September 15th, 2016 as the Scheduled First Energy Date.

Seller has selected December 1st, 2016 as the Scheduled Operation Date.

In making these selections, Seller recognizes that adequate testing of the Facility and completion of all requirements in paragraph 5.2 of this Agreement must be completed prior to the project being granted an Operation Date.

REDLINED FORMAT

APPENDIX B

FACILITY AND POINT OF DELIVERY

Project Name: Orchard Ranch Solar, LLC

Project Number: 25573998

B-1 DESCRIPTION OF FACILITY

(Must include the Nameplate Capacity rating and VAR capability (both leading and lagging) of all Generation Units to be included in the Facility.)

Orchard Ranch Solar, LLC is a 20 MW AC; 26.19 MW DC single-axis tracking photovoltaic facility to be located on approximately 160 acres near Orchard in Ada County, Idaho. The Project consists of 10 (ten) x 2.0 MWac SMA inverters (or equivalent) and 85,880 x JA 305w dc panels (or equivalent).

Nameplate: 20 MWac

Var Capability (Both leading and lagging) Leading is 0.95 Lagging is 0.95.

B-2 LOCATION OF FACILITY

Near: ~~Orchard, ID~~Pleasant Valley, ID

Actual or nearest physical street address: ~~Orchard Road~~Pleasant Valley Road Ada County, Idaho
83716

GPS Coordinates: Latitude Decimal Degrees: ~~43°27'30.15"N~~43.332139-

Longitude Decimal Degrees: ~~116°14'3.32"W~~-116.029743-

State: Idaho County: ~~Power~~Ada

Description of Interconnection Location: 34.5kV line near ~~Orchard~~Pleasant Valley Road

B-3 SCHEDULED FIRST ENERGY AND OPERATION DATE

Seller has selected September 15th, 2016 as the Scheduled First Energy Date.

Seller has selected December 1st, 2016 as the Scheduled Operation Date.

In making these selections, Seller recognizes that adequate testing of the Facility and completion of all requirements in paragraph 5.2 of this Agreement must be completed prior to the project being granted an Operation Date.